



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



DAN WYANT
DIRECTOR

April 23, 2013

Ms. Alexis Sidari
ARCADIS U.S., Inc.
6723 Towpath Road
Syracuse, New York 13214

US EPA RECORDS CENTER REGION 5



467137

Dear Ms. Sidari:

Pursuant to the Administrative Order by Consent, AOC-ERD-99-010 (AOC), Attachment 1 – Schedule for Completing Response Activities for the King Highway Landfill, Operable Unit 3, and the Five Former Georgia-Pacific Mill Lagoons, the Michigan Department of Environmental Quality (MDEQ) has concluded its review of the latest draft Final Operation and Maintenance Plan (OMP) and the Construction Completion Report, known as Deliverables 12 and 14, respectively. In addition, this letter also provides contingent approval for the Investigation Plan for Off-Site Landfill Gas Migration, dated March 18, 2013, and for the Flow Reversal Technical Memorandum, dated March 22, 2013.

Construction Completion Report Comments

With respect to the Construction Completion Report, there are no further comments beyond what we have already discussed and that Georgia-Pacific has corrected. Please submit this document as Deliverable 14, within 15 days in accordance with the AOC, Attachment 1 - Schedule for Completing Response Activities, Item 5. Upon receipt of this document, the MDEQ will proceed to issue its approval of this certification (Item 6).

Final Operation and Maintenance Plan Comments

In Section 3.4 of the OMP, the first and second paragraphs are inconsistent. The first paragraph states that monitoring is currently being conducted on a quarterly basis, then the second paragraph states monitoring "...conducted annually for a minimum of 30 years." Remove the word "annually." As indicated, it is quarterly monitoring that is being conducted, and by removing the word "annually," it allows flexibility in the monitoring frequency performed at some later date.

In Section 3.4 of the OMP, third paragraph: Delete the word "increased" in the third line; again, quarterly monitoring is already being performed.

After completing the above stated modifications to the OMP, please submit Deliverable 12 within 15 days in accordance with the AOC, Attachment 1 - Schedule for Completing Response Activities, Item 5.

Flow Reversal

Please confirm that the MDEQ has received all of the data associated with the "Flow Reversal" spreadsheets; it does not seem that we received all the data as requested. A final review of this Flow Reversal proposal will then be conducted, and barring anything

unforeseen, it appears the MDEQ will be in a position to approve this sampling strategy for the King Highway Landfill only.

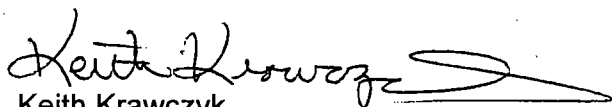
Investigation Plan for Off-Site Landfill Gas Migration

Per our recent discussions, the MDEQ generally agrees with the proposed gas well locations, and hereby approves the installation of those wells. This approval is based on the understanding that locations could be somewhat iterative due to the results of the proposed "installation and evaluation techniques," the slope of berm (i.e., G14-20), actual utility location(s), etc. We see value in making that a collaborative field effort with MDEQ representation being on-site during installation and evaluation, to gain consensus regarding meeting the objectives of evaluating potential off-site methane migration as well as utility corridors acting as either migration pathways and/or venting locations.

As we discussed, additional documentation, if available, of landfill gas monitoring during any previous underground work performed along the storm sewer can be used as another line of evidence, if appropriate, to consider potential methane issues associated with the waste left in place at King Highway Landfill. It is expected that, along with the proposed borings, the storm sewer utility corridor that runs along the western portion of the site will be evaluated for type of backfill material, actual elevation, and with gas monitoring at some temporary monitoring locations within the "utility corridor/trench/backfill"; and, ideally, permanent monitoring locations along the "trench," if possible. Lastly, monitoring into the sewer via manhole covers located closest to the property in north and south directions should also be conducted. That should be conducted during quarterly monitoring events as that is a minimal effort that may provide worthwhile data.

Thank you for your efforts. Please contact me with any questions regarding the issues above, the expected schedule for submittals, etc., as we move to final execution of these items.

Sincerely,



Keith Krawczyk
Senior Project Manager
Site Assessment and Site Management Unit
Superfund Section
Remediation and Redevelopment Division
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cc: Mr. Garry Griffith, Georgia-Pacific
✓ Mr. Michael Berkoff, United States Environmental Protection Agency
Ms. Polly Synk, Michigan Department of Attorney General
Ms. Daria W. Devantier, MDEQ